

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DEREK SINCERE BLACK WOLF CRYER

Plaintiff,

CIVIL ACTION

V.

NO. 1:05-cv-11289

KATHLEEN DENNEHY, MICHAEL THOMPSON,
CAROL MICI, GREG McCANN, TINA RANNO,
MAE ROBINSON, GREG POLADIAN,
TOM LAVELLE, WILLIAM TAYLOR

Defendants,

FILED
IN CLERKS OFFICE
2006 JUN -5 PM 3:49
U.S. DISTRICT COURT
DISTRICT OF MASS.

PLAINTIFF'S MOTION FOR A PRELIMINARY INJUNCTION

Plaintiff moves this Court to issue an immediate preliminary injunction ordering Defendants Dennehy, Thompson, or their agents to:

- 1). Immediately reinstate the Plaintiff's access to the Native Indian room and locker therein during the mornings from 9:00am to 11:00am, and in the afternoons from 1:00 pm to closing time for Spiritual (Religious) Meditation, Study, Prayer, and Worship.
- 2). Allow Plaintiff to practice Black Indian Spirituality on Thursdays, Fridays, and Saturdays.
- 3). Immediately provide Plaintiff access to an Outside Worship Area.
- 4). Provide Plaintiff access to morning and afternoon Smudgeing and Pipe Prayer Ceremonies.
- 5). Provide Plaintiff access to Ceremonial Tobacco for Prayer & Offerings.
- 6). Allow Plaintiff to buy and or have donated Authenticated Native Indian Spiritual Items from Authenticated Native Sources.
- 7). Allow Plaintiff to wear 4 Row Chockers.
- 8). Allow Plaintiff to consume Buffalo Jerky during Native Sacred Holy Days.
- 9). Allow Plaintiff to possess His own Personal Prayer Pipe.

- 10). Allow Plaintiff access to Native Arts and Crafts.
- 11). Return the Native books from the general library back to the area in the programs building designated for Native Worship.
- 12). Allow Plaintiff access to Native Clergy one on one Visits, Phone Calls, and Mail Correspondence for Spiritual Council.
- 13). Curb the issue of Staff Harassment and Racial and Religious Bigotry, and Discrimination.

As set forth in the Plaintiff's attached Affidavit and Memorandum of Law is support of Plaintiff's Motion for Preliminary Injunction, the Plaintiff Prays this Court grant this motion.

Respectfully Submitted,

Derek Sincere Black Wolf Cryer, Pro se
Derek Sincere Black Wolf Cryer, Pro se
MCI Shirley Medium
P.O. Box 1218 - Harvard Road
Shirley, MA. 01464

DATE: June 1, 2006

CC: file/6-1-06

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of this Motion for a Preliminary Injunction has been served upon the Clerk of the U.S. District Court.

Derek Sincere Black Wolf Cryer, Pro se
Derek Sincere Black Wolf Cryer, Pro se
MCI Shirley Medium
P.O. Box 1218 - Harvard Road
Shirley, MA. 01464

DATE: June 1, 2006

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